

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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MERLENE BACCHUS

Plaintiff,

12 CV 1663(PKC)(MDG)

-against-

NOTICE OF MOTION

THE CITY OF NEW YORK, RENÉE PEPPER and
BOARD OF EDUCATION EMPLOYEES LOCAL 372,
DISTRICT COUNCIL 37, AMERICAN FEDERATION
OF STATE, COUNTY AND MUNICIPAL EMPLOYEES,
AFL-CIO,

Defendants.
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PLEASE TAKE NOTICE that upon the Statement of Undisputed Facts of Defendants City of New York and Renée Pepper (“City defendants”) pursuant to Rules 56.1 of the Local Rules of this Court, dated April 25, 2014, the Declaration of Kathryn E. Martin, dated April 25, 2014, and the exhibits annexed thereto, and the Memorandum of Law in Support of City Defendants’ Motion for Summary Judgment, dated April 25, 2014, and upon all other pleadings and proceedings previously had herein, City defendants will move this Court, at the United States District Court for the Eastern District Court of New York, located at 225 Cadman Plaza East, Brooklyn, New York, 11201, before the Honorable Pamela K. Chen, United States District Judge, at a date and time to be determined by the Court, for an order granting City Defendants’

motion for summary judgment.

Dated: New York, New York
April 25, 2014

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By: /s/
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